

REMARKS

This Amendment, filed in reply to the Office Action dated March 21, 2006, is believed to be fully responsive to each point of rejection raised therein. Accordingly, favorable reconsideration on the merits is respectfully requested.

Claims 1, 2, 4-45 and 47-102 are all the claims pending in the application. In the present Amendment, Applicant amends claims 1, 43 and 78. No new matter is added.

I. Claim Rejections - 35 U.S.C. § 102

Claims 1-2, 4-9, 11-17, 20-28, 36-45, 47-57, 60-69, 71-75, 77-98, and 102 are rejected under 35 U.S.C. § 102(b) as being anticipated by Moezzi *et al.* (U.S. Patent No. 5,850,352, hereinafter “Moezzi”). Applicant traverses the rejections for the following reasons.

With regard to claim 1, Moezzi does not teach or suggest each feature of the claim. For example, claim 1 is amended to recite:

a character positioning unit for obtaining a time when the target character passes a predetermined point;

an object speed detecting unit for calculating a speed of the target character based on a distance between two points and a time for the target character to pass the two points;

the image collecting unit searches only images captured in a predetermined period of time and moving area which is calculated based on the time when the target character passes the predetermined point and the speed of the target character.

Moezzi relates to a method of synthesizing images from multiple cameras each at a different spatial location. *See abstract.* A Video Data Analyzer performs object detection, recognition and tracking in each of the camera planes corresponding to the different perspectives based on differences in spatial position to determine object motion. *See col. 28, lines 1-7.*

In Moezzi, the detection, recognition and tracking are performed based on differences in spatial position to determine object motion. Moezzi does not teach or suggest a character positioning unit for obtaining a time when the target character passes a predetermined point; and an object speed detecting unit for calculating a speed of the target character based on a distance between two points and a time for the target character to pass the two points. Further, Moezzi does not teach or suggest that the image collecting unit searches only images captured in a predetermined period of time and moving area which is calculated based on the time when the target character passes the predetermined point and the speed of the target character.

In view of the foregoing, claim 1 is patentable. Because claims 43 and 78 recite features analogous to those given above with respect to claim 1, Applicant submits that claims 43 and 78 are patentable at least for reasons similar to those of claim 1.

Applicant submits that claim 2, 4-9, 11-17, 20-28, 36-42, 44, 45, 47-57, 60-69, 71-75, 77, 79-98, and 102 are patentable at least by virtue of their respective dependencies.

II. Claim Rejections - 35 U.S.C. 103

Claims 10, 18-19, 29-35, 58-59, 70, 76, and 99-101 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Moezzi, as applied to claims 1, 43, 78 above, and further in view of Narayen *et al.*, (U.S Patent No. 6,035,323, hereinafter "Narayen").

Applicant submits that Narayen does not cure the deficient teachings of Moezzi discussed above with respect to claims 1 and 43.

Therefore, Applicant submits that claims 10, 18-19, 29-35, 58-59, 70, 76 and 99-101 are patentable at least by virtue of their respective dependencies.

III. Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,




CHRISTOPHER LIPP 41157

SUGHRUE MION, PLLC
Telephone: (202) 293-7060
Facsimile: (202) 293-7860

WASHINGTON OFFICE

23373

CUSTOMER NUMBER

 Susan P. Pan
Registration No. 41,239

Date: June 21, 2007